

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

IN RE EQUIFAX, INC. CUSTOMER
DATA SECURITY BREACH
LITIGATION

MDL DOCKET NO. 2800
1:17-md-2800-TWT

**JOINT MOTION FOR EXTENSION OF BRIEFING SCHEDULE FOR
CITY OF CHICAGO'S MOTION TO ESTABLISH A SEPARATE TRACK**

Plaintiff City of Chicago (“City”) and Defendant Equifax Inc. (“Equifax”) respectfully submit this Joint Motion for Extension of Briefing Schedule for City of Chicago’s Motion to Establish a Separate Track, showing the Court as follows:

1. On January 10, 2018, the Court entered Case Management Order No. 2 (Dkt. No. 87) establishing two “tracks” in this MDL proceeding, one for Consumer Plaintiffs and one for Financial Institution Plaintiffs;
2. On May 22, 2018, the City filed a Motion to Establish a Separate Track for Governmental Enforcement Actions (Dkt. No. 385);
3. Equifax’s response to the City’s Motion is currently due on June 5, 2018;
4. A seven (7) day extension for Equifax to prepare its response to the City’s Motion, through and including June 12, 2018, will allow sufficient time for

Equifax to assess and respond to the arguments and positions put forth in the Motion;

5. Further, a three (3) day extension for the City to file a reply, through and including June 29, 2018, will allow sufficient time for the City to prepare a reply to Equifax's response; and

6. Counsel for Equifax and the City have conferred and each side agrees to the proposed extensions.

WHEREFORE, the Parties respectfully request that the Court enter an order granting (i) an extension of time for Equifax to respond to the City's Motion, through and including June 12, 2018; and (ii) an extension of time for the City to file a reply, through and including June 29, 2018. A proposed order is attached for the Court's consideration.

Respectfully submitted this 4th day of June, 2018.

/s/ Christie L. Starzec

John L. Hendricks
Thomas P. McNulty
Christie L. Starzec
City of Chicago Department of Law
30 North LaSalle Street, Suite 1230
Chicago, Illinois 60602
Tel.: (312) 744-6975
John.Hendricks@cityofchicago.org
Thomas.McNulty@cityofchicago.org
Christie.Starzec@cityofchicago.org

Fiona A. Burke
City of Chicago Department of Law
30 North LaSalle Street, Suite 1400
Chicago, Illinois 60602
Tel.: (312) 744-6929
Fiona.Burke@cityofchicago.org

Counsel for Plaintiff City of Chicago

/s/ S. Stewart Haskins II

KING & SPALDING LLP
David L. Balsler
Georgia Bar No. 035835
Phyllis B. Sumner
Georgia Bar No. 692165
S. Stewart Haskins II
Georgia Bar No. 336104
Elizabeth D. Adler
Georgia Bar No. 558185
John C. Toro
Georgia Bar No. 175145
1180 Peachtree Street, N.E.
Atlanta, Georgia 30309
Tel.: (404) 572-4600
Fax: (404) 572-5140
dbalser@kslaw.com
psumner@kslaw.com
shaskins@kslaw.com
eadler@kslaw.com
jtoro@kslaw.com

Counsel for Defendant Equifax Inc.

CERTIFICATE OF COMPLIANCE

Pursuant to L.R. 7.1D, the undersigned certifies that the foregoing complies with the font and point selections permitted by L.R. 5.1B. This Response was prepared on a computer using the Times New Roman font (14 point).

Respectfully submitted this 4th day of June, 2018.

/s/ S. Stewart Haskins II
KING & SPALDING LLP

CERTIFICATE OF SERVICE

I hereby certify that on June 4, 2018, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s/ S. Stewart Haskins II
S. Stewart Haskins II